

**BAKER DECLARATION**  
**EXHIBIT K**

ALISHA SINGLETON; January 31, 2019

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1 UNITED STATES DISTRICT COURT

2 WESTERN DISTRICT OF WASHINGTON

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4 STATE OF WASHINGTON, )

5 PLAINTIFF, ) NO. 3:17-CV-05806-RJB

6 VS. )

7 THE GEO GROUP, INC., )

8 DEFENDANT. )

9 )

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12 DEPOSITION UPON ORAL EXAMINATION OF

13 ALISHA SINGLETON

14

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15 10:00 A.M.

16 JANUARY 31, 2019

17 800 FIFTH AVENUE, SUITE 2000

18 SEATTLE, WASHINGTON

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24 REPORTED BY: BETSY E. DECATER, RPR, CCR 3109

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ALISHA SINGLETON; January 31, 2019

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1 Q. The documents that you reviewed, were they  
2 e-mails or were they policy documents?

3 A. Could you rephrase that question? I'm not  
4 understanding.

5 Q. Sorry. You mentioned that -- you testified that  
6 you reviewed documents in preparation for this  
7 deposition.

8 A. Okay.

9 Q. Were those documents e-mails or policy documents?

10 A. I'm not sure of which ones. I know there could  
11 have been a mix of both.

12 Q. Let's start with some of your background. What's  
13 the highest level of education you completed?

14 A. Bachelor's degree.

15 Q. In what?

16 A. Law and justice.

17 Q. And when did you start working at GEO?

18 A. 2001 September.

19 Q. 2001?

20 A. Yes.

21 Q. Sorry. When did you graduate with your  
22 bachelor's?

23 A. I don't recall specifically.

24 Q. Can you give me an approximation of the year you  
25 graduated?



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1 A. Between 2001 and 2003.

2 Q. So since graduating with a bachelor's in law and  
3 justice, you've been working at GEO the entire time?

4 A. Correct.

5 Q. What was the first position you had at GEO?

6 A. As a detention officer.

7 Q. How long did you work that job for?

8 A. Approximately three to four years.

9 Q. And then what did your job title become?

10 A. Classification officer.

11 Q. Is that considered a promotion?

12 MR. PUSATERI: Object to form.

13 A. I'm not sure exactly what you're meaning by a  
14 promotion. It's just a different position within the  
15 facility.

16 Q. Did you get a pay increase?

17 A. No.

18 Q. Darn.

19 Was there a classification officer before you who  
20 held the position before you?

21 A. I don't recall. It was a while ago.

22 Q. What was your responsibilities as a  
23 classification officer?

24 A. To review criminal histories and their prior  
25 background to determine their custody levels while in



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1 custody in the facility.

2 Q. And how long have you held that position?

3 A. Since approximately 2006.

4 Q. Is that the position you still hold today?

5 A. Yes.

6 Q. What training did you receive upon becoming a  
7 classification officer?

8 A. I don't recall specifically. I know I didn't go  
9 through any specific training, but I don't recall  
10 exactly what occurred back then.

11 Q. Who told you or who gave you instruction on  
12 custody levels and things like that?

13 A. The ICE detention standards.

14 Q. Is that the PBNDS?

15 A. Yes. Back then they were just called the  
16 detention standards.

17 Q. Did an ICE official train you on the  
18 classification standards?

19 A. No.

20 Q. So you read the ICE detention standards and then  
21 just implemented them; is that right?

22 A. We follow exactly what they state in there to do,  
23 so they give specific protocol on how to answer those  
24 questions and how to classify.

25 Q. And I personally don't learn very well from just



ALISHA SINGLETON; January 31, 2019

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1        were first hired in 2001?

2        A. No.

3        Q. That job did not exist?

4        A. No.

5        Q. Were you the first person to be a classification  
6        officer, then?

7        A. Not that I recall.

8        Q. Just so I can pin it down, are you saying that  
9        you don't recall whether you were the first person or  
10        you don't recall if there was a person in that position?

11        A. Before I was the classification officer, there  
12        was a person in there.

13        Q. A classification person?

14        A. Correct.

15        Q. Since you don't recognize this document, I might  
16        come back to it.

17            Can you tell me what your job responsibilities  
18        are over the voluntary work program?

19        A. Complying with the requirements of the ICE PBNDS  
20        standards.

21        Q. Anything else?

22        A. Everything that I do for that job is in  
23        compliance with the ICE PBNDS.

24        Q. I'm not asking if it's in compliance. I'm asking  
25        what is your job. What do you do on a daily basis?



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1     What are your tasks?

2     A.    So day-to-day tasks would involve receiving  
3     requests from the population requesting to volunteer and  
4     participate in the voluntary work program, processing  
5     those requests based on their stated requests and  
6     assigning them to the jobs that they're requesting based  
7     on the guidelines set forth in the ICE PBNDS standards.

8     Q.    Anything else?

9     A.    And responding to those requests. That would be  
10    it.

11    Q.    Do you pay them?

12    A.    Me?

13    Q.    Yeah.

14    A.    No.

15    Q.    Who pays them?

16    A.    I'm not sure. Not me.

17    Q.    You don't manage the payroll?

18    A.    No.

19    Q.    So how do people record who's working and who's  
20    not working?

21    A.    That's not my department. I don't handle that,  
22    so I don't have firsthand knowledge who specifically  
23    does the worker pay.

24    Q.    Do you know who does the worker pay?

25    A.    No.



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1 Q. Now, if somebody refuses to work, do they get  
2 paid that day?

3 A. If they have completed their job, then they will  
4 still be listed.

5 Q. If they're listed on -- if they're listed as  
6 working, they get paid. Is that how it works?

7 MR. PUSATERI: Object to form.

8 A. Can you rephrase that? I'm not understanding.

9 Q. Let me black up.

10 How much do detainees get paid for working at the  
11 voluntary work program?

12 A. \$1 a day.

13 Q. Have they ever been paid more?

14 A. There may have been a few instances where that  
15 did occur.

16 Q. Can you tell me what some of those instances  
17 were?

18 A. So we do have -- for a while we have the barber  
19 detail, at some point the kitchen, and those were the  
20 two areas that I recall right now.

21 Q. So barbers got paid how much?

22 A. The barer got paid a dollar for the barber job.  
23 If he held an additional job, then he received an  
24 additional dollar.

25 Q. Is that no longer the practice today?



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1 Q. How about currently?

2 A. Currently it would be Ms. Henderson.

3 Q. Anybody else?

4 A. Not that I recall at the moment.

5 Q. So this is going to be a little tedious, but I'm

6 just trying to be thorough.

7 What are the jobs that are available as part of  
8 the voluntary work program?

9 A. From what I recall at the moment, we have  
10 detainees that volunteer in the intake area, they  
11 volunteer in the medical area, they volunteer in the  
12 hallways, they volunteer in the living units, they  
13 volunteer in visitation, they volunteer in barbershop,  
14 they volunteer in the laundry, they volunteer in the  
15 kitchen, and they volunteer in outside recreation as  
16 well as indoor recreation.

17 Q. When you say the hallway, are you referring -- is  
18 that sometimes referred to as the gray mile?

19 A. Correct.

20 Q. Why is it called the gray mile?

21 A. Because it's the color gray.

22 Q. Oh, the hallway is gray?

23 A. Yes.

24 Q. And is it really long?

25 A. Yes.



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1 kitchen work or for pod work?

2 A. I wouldn't know. Yesterday I didn't answer  
3 requests.

4 Q. When was the last time you answered requests?

5 A. The day before that.

6 Q. Let's do that day. Did you get more requests for  
7 kitchen work or pod work?

8 A. Probably kitchen.

9 Q. How many requests on average do you receive a  
10 day?

11 A. It can vary.

12 Q. Between what and what?

13 A. It can vary anywhere from 5 to 50.

14 Q. And how do you split it up between you and Heye?

15 You guys each get -- I'm assume are you saying  
16 the whole department get 5 to 50 or the --

17 A. The department.

18 Q. So how do you split it up between you and Heye?

19 A. We don't split it up. We both have access to the  
20 system, and we just respond to the request.

21 Q. Is there a waiting list for jobs?

22 A. For some jobs.

23 Q. Which jobs have a waiting list?

24 A. I can't say specifically which ones. I mean, it  
25 depends on the area.



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1 Q. Can you explain to me what do you mean by it  
2 depends on the area?

3 A. So it depends. Depends on the area because every  
4 area clearly has different amounts of workers that may  
5 be authorized for that area. So depending on the  
6 amount, you know, would ultimately dictate the  
7 availability of certain jobs.

8 Q. So there could be a waiting list for any job?

9 A. Absolutely.

10 Q. But there are waiting lists for every job  
11 generally at some point in time?

12 A. At some point every area has had a waiting list  
13 at some point.

14 Q. And so there isn't one waiting list for all jobs,  
15 there's a waiting list for each type of job?

16 A. Correct.

17 Q. And if you get a request for any job, which  
18 waiting list would you put that detainee worker on?

19 A. They would be put on all the wait lists that  
20 they're eligible to work for.

21 Q. And then whichever one comes up first they get  
22 offered first?

23 A. Correct.

24 Q. Who manages the wait list?

25 A. The classification department.



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1 roughly be around 2015 when it looks like it became  
2 effective.

3 Q. Do you know who -- did you get this from your  
4 direct supervisor?

5 A. I don't recall.

6 Q. Are these policies and procedures -- this is, I'm  
7 assuming, accessible from your computer?

8 A. Yes.

9 Q. Do these policies and procedures apply to the  
10 voluntary work program at the Northwest Detention  
11 Center?

12 A. Yes.

13 Q. Do you see -- turning to page 2 and the note,  
14 it's a note, and then it says No. 1, "Detainees who are  
15 released from disciplinary segregation may not be  
16 considered for a work assignment until they have shown a  
17 positive period of adjustment."

18 Do you know who -- or sorry. What's disciplinary  
19 segregation?

20 A. Disciplinary segregation is a housing unit within  
21 the facility.

22 Q. What's the -- how long does the positive period  
23 of adjustment have to be?

24 A. It's never been specified.

25 Q. Who decides that, you?



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1 A. (Witness complies.)

2 Q. I'm just curious. This says D-1 laundry detail.

3 Does this mean the D-1 pod does laundry for the  
4 entire facility or specific?

5 A. They do the folding of the laundry.

6 Q. Of the entire facility's laundry?

7 A. The detainee population laundry.

8 Q. And it says approximate -- in the fifth column,  
9 it says approximately and then it says 1530 to 1100.  
10 What is that referring to?

11 A. That's referring to laundry can be sent to that  
12 unit at any time during that given period. It's not a  
13 set time when the laundry is done in the laundry  
14 department.

15 Q. Sorry, you're going to have to explain this to me  
16 because it's not intuitive for me.

17 All of these other pages are specific pods, these  
18 are the jobs for each pod. D-1 laundry detail, these  
19 are people that work outside the pod; is that right?

20 A. No.

21 Q. They work inside the pod?

22 A. Inside D-1.

23 Q. Okay. What does this third column OTM mean?

24 A. OTM stands for other than Mexican.

25 Q. What does that mean, that the detainee is not



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1 you know, the OTM column?

2 MR. PUSATERI: Object to form.

3 Q. (BY MS. CHIEN) Like who reviews that?

4 A. So we are audited by ICE to make sure we're in  
5 compliance with the ICE PBNDS. So this specific  
6 standard that's going to require that, we're required to  
7 provide documentation to submit that. So this would at  
8 that time be attached to that.

9 Q. Going back to this female laundry detail -- and,  
10 sorry, what was the shift? The 1530 to 11:00, that's  
11 when they could have laundry?

12 A. That's when the laundry could possibly come into  
13 the living unit. So that's during swing shift.

14 Q. So they may be called to fold the laundry at any  
15 time during that time?

16 A. It's brought down to the unit, so they're not  
17 called.

18 Q. The laundry is delivered, and then they have to  
19 fold it?

20 A. Correct.

21 Q. I didn't see a laundry detail for any of these  
22 other pods. Why is that?

23 A. Because that's a detail that's specific to the  
24 female units.

25 Q. Do they fold -- oh, they fold the laundry for all



ALISHA SINGLETON; January 31, 2019

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1 the other pods as well?

2 A. It's just a general laundry. All of the laundry,  
3 once it's collected, goes into the laundry room to be  
4 washed.

5 Q. And so it goes into the laundry room to be  
6 washed, and then the -- whoever works in laundry  
7 provides it in a big bunch and D-1 laundry detail folds  
8 it?

9 A. Correct, at that time, yes. It's goes -- they're  
10 in bins.

11 Q. The next page, it says, "female detail medical  
12 cleanup." And then it also has a shift listed 11:00 to  
13 12:30. What does that mean?

14 A. That means approximately they will go do that  
15 detail between 11:00 and 12:30.

16 Q. Does it usually take an hour and a half?

17 A. I wouldn't have direct knowledge of that because  
18 I don't supervise it.

19 Q. How was this shift set? Why do you put 11:00 to  
20 12:30 on there?

21 A. That would have been per medical's request.

22 Q. Do you have to run that by your direct  
23 supervisor?

24 A. No. The females go down there for work at  
25 approximately that time and then during 2007, because



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1           Q. And if they have had medical clearance and they  
2 have already -- so you don't check whether or not they  
3 have already been trained before?

4           A. Correct. So if they -- for example, if they have  
5 already -- if the documentation I have shows they have  
6 already submitted a request to medical for a kitchen  
7 clearance, then I will at that point go look at the  
8 actual detainee's file to see if he's actually ever  
9 worked in the kitchen.

10          Q. And what you do if they have worked in the  
11 kitchen before?

12          A. Then I will find out when is the last time they  
13 actually worked in the kitchen and then look for the  
14 documentation with the reason for why they stopped.

15          Q. And why is that important for why they stopped?

16          A. Because kitchen work requires medical clearance.  
17 So if they stopped because they're sick, they're now  
18 required to be medically cleared again. If they stopped  
19 working because they were written up for disciplinary  
20 sanction from the kitchen and the sanction was removal  
21 for that. Now that would be the reason why they removed  
22 them and they can't go back if it was a loss of that  
23 job. Or if they just quit, then they just quit.

24          Q. So if the medical clearance -- how long does the  
25 medical clearance last for? If the detainee was never



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1 out and that's who the barbershop cleaners are.

2 Q. So anyone who works in the barbershop, they only  
3 sign one or the other or do they sign both?

4 A. One or the other.

5 Q. And so this is a document that you're familiar  
6 with?

7 A. Yes, this appears to be.

8 Q. You mentioned a paint detail. And is there a  
9 roster for a paint detail?

10 A. No, because that's one of those irregular details  
11 that we don't assign because it only occurs on a  
12 periodic basis. It can be one day or a few days a week.

13 Q. I think you mentioned -- we were talking about it  
14 earlier there was like -- ICE usually authorizes the  
15 paint detail or something like that?

16 MR. PUSATERI: Object.

17 Q. (BY MS. CHIEN) Are paint details something  
18 that's requested by ICE or GEO or do you not know?

19 A. I would not have direct knowledge of how that  
20 determination is made.

21 Q. Do you have any -- when somebody's assigned to  
22 this irregular paint detail, do you ask how many hours  
23 is required for the paint detail or how many days needed  
24 for the job?

25 MR. PUSATERI: Object.



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AFTERNOON SESSION

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2:03 p.m.

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5

CONTINUING EXAMINATION

6

BY MS. CHIEN:

7

Q. So let's talk pod porters.

8

A. Okay.

9

Q. What do pod porters do?

10

A. They are generally going to be responsible for the cleanliness of the living area, so the individual units.

13

Q. How are they divided?

14

MR. PUSATERI: Object.

15

Q. (BY MS. CHIEN) Are they divided, like in different job responsibilities, or is everyone just pod porter or are there set categories for pod porters?

18

A. Yes. So they're assigned a specific job within the pod.

20

Q. What are the different jobs?

21

A. So some of them you'll have shower cleaners, depending on the unit and the setup, because every unit is set up different -- well, not all of them, but they have different setups. So some would be shower cleaners, bathroom cleaners. You have like a day shift



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1 cleaner, which does the general cleaning. You'll have a  
2 swing shift cleaner which is general cleaning in the  
3 pod, you have a food server, cart pusher, pod laundry  
4 worker.

5 Q. How are those responsibilities or subcategories  
6 identified?

7 MR. PUSATERI: Object.

8 A. I'm not sure exactly what you are asking.

9 Q. Who came up with the job for a pod porter to do?

10 MR. PUSATERI: Object.

11 A. That's not a decision that I would have made  
12 specifically identifying that.

13 Q. Well, then, who told you that those are the  
14 categories of work for pod porters?

15 A. It's been so long I couldn't specifically say,  
16 but it ideally would probably be my direct supervisor.

17 Q. Do pod porters have a specific -- have a work  
18 schedule other than they're on the day shift and  
19 graveyard?

20 MR. PUSATERI: Object.

21 Q. (BY MS. CHIEN) Let me take a step back.

22 What work schedule do the pod porters have?

23 A. It will be dependent on what their specific job  
24 is.

25 Q. Let's do shower cleaner.



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1       detention officers supervising pod workers?

2           A. Yes. This is one of the documents that's  
3 submitted.

4           Q. Are shower cleaners limited to doing the work  
5 that's listed in this job description?

6           A. No. It clearly states other duties as assigned.

7           Q. Can a shower cleaner sometimes be used as a  
8 bathroom cleaner?

9           A. That's not something that I would have knowledge  
10 of, what they do with those other duties, because I  
11 don't supervise those areas.

12           Q. So sometimes to your knowledge shower cleaners  
13 could clean bathrooms as well?

14           MR. PUSATERI: Object to form; misstates  
15 testimony.

16           A. No, that's not information that I would be  
17 knowledgeable of because I don't supervise that area.

18           Q. When it says "other duties as assigned," assigned  
19 by who?

20           A. That would be something responsible for the  
21 person supervising that area.

22           Q. And that's a GEO detention officer?

23           A. Correct.

24           Q. When you're managing the voluntary work program,  
25 is there a reason why you have -- why is there not just



BERTHA HENDERSON; January 30, 2019

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1 A. Yes.

2 Q. And is there a particular uniform or pair of  
3 boots that's assigned to each detainee worker who works  
4 there?

5 A. No.

6 Q. So all the detainee workers share the uniforms  
7 and share the boots when they're on duty?

8 A. That is correct. There's different sizes.

9 Q. Do they come in and change when they get to the  
10 kitchen?

11 A. Yes, they do.

12 Q. And you have a changing room for that?

13 A. Yes. They have a little area where there's  
14 lockers.

15 Q. Do you recall instances involving the boots that  
16 have caused harm to detainee workers?

17 MR. PUSATERI: Object to form.

18 A. We have procedures in place that after each shift  
19 they are sanitized. I am aware of an incident that was  
20 brought to my attention, but it never was pinpointed  
21 that it came directly from the kitchen because we do  
22 have a process that after each shift those boots are  
23 sanitized.

24 Q. And the issue was a medical issue that came to  
25 your attention; is that right?



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1 Q. And book out?

2 A. He departed the facility.

3 Q. And fired?

4 A. Could have been that he was written up for a  
5 sanction.

6 Q. And when they're written up, then they're fired?

7 A. No. They will have a hearing, and the hearing  
8 dictates what occurs.

9 Q. But the day that they're written up, they might  
10 be told to leave?

11 A. I'm not sure of the protocol that they do in  
12 those areas. I don't supervise those areas.

13 Q. On 26 it says sick, I think.

14 A. Sick.

15 Q. Oh, sick. Thanks.

16 You mentioned that you were at one point in  
17 charge of pay or managed the pay for the voluntary work  
18 program, right?

19 A. Correct.

20 Q. What does that involve? What did you do each day  
21 regarding pay?

22 A. That was a while ago. So I know I'd have the  
23 records for -- attendance records for who worked on any  
24 given day on the shifts, and I would go through and  
25 enter them manually into whatever financing system we



1        **were using at the time.**

2        Q. What are some of the financing systems you  
3 remember?

4        A. Back then we were using Canteen.

5        Q. What are you using now?

6        A. I don't know. I don't do the pay.

7        Q. Were there any other finance systems that you  
8 used?

9        A. No, not that I can recall.

10       Q. And when you said you would get the records and  
11 then you would manually input it, when you say records,  
12 do you mean the pay sheets?

13       A. They could be the pay sheets, the copy of formal  
14 count sheet for the kitchen, those documents.

15       Q. And then what happens?

16           Who else uses Canteen? Is it just you? Is that  
17 a program just for you?

18       A. No, it's not just for me. I'm not sure who else  
19 uses it or why.

20       Q. Do you indicate if a detainee should get paid the  
21 dollar or if they have back pay, like two or three  
22 dollars?

23           MR. PUSATERI: Object to form.

24       A. I'm not sure what you're asking.

25       Q. Well, let me do this another way.



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## REPORTER'S CERTIFICATE

2 I, BETSY E. DECATER, the undersigned Certified Court  
3 Reporter, pursuant to RCW 5.28.010 authorized to  
4 administer oaths and affirmations in and for the State  
5 of Washington, do hereby certify that the sworn  
6 testimony and/or proceedings, a transcript of which is  
7 attached, was given before me at the time and place  
8 stated therein; that any and/or all witness(es) were  
9 duly sworn to testify to the truth; that the sworn  
10 testimony and/or proceedings were by me stenographically  
11 recorded and transcribed under my supervision, to the  
12 best of my ability; that the foregoing transcript  
13 contains a full, true, and accurate record of all the  
14 sworn testimony and/or proceedings given and occurring  
15 at the time and place stated in the transcript; that a  
16 review of which was reserved; that I am in no way related  
17 to any party to the matter, nor to any counsel, nor do I  
18 have any financial interest in the event of the cause.

19 WITNESS MY HAND and DIGITAL SIGNATURE this 12th day  
20 of February, 2019.



21

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